

**ENTERED**

June 06, 2023

Nathan Ochsner, Clerk

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE:	§	
FREE SPEECH SYSTEMS, LLC	§	CASE NO. 22-60043
DEBTOR	§	CHAPTER 11, SUBCHAPTER V
<hr/>		
SECURITY BANK OF TEXAS	§	
MOVANT	§	
	§	
v.	§	Hearing Date: JUNE 8, 2023
	§	Hearing Time: 10:00 A.M.
FREE SPEECH SYSTEMS, LLC	§	
DEBTOR	§	

**AGREED ORDER MODIFYING AUTOMATIC STAY**

Came on for consideration the Motion of Relief from Stay ("Motion") filed by Security Bank of Texas ("Movant") as Document No. 589. The Court having considered the Motion, any and all responses filed thereto, and the agreement of counsel, is of the opinion that the following Agreed Order Modifying Automatic Stay should be entered. It is therefore, ORDERED that:

1. Automatic Stay. The automatic stay provided by 11 U.S.C. §362 shall remain in effect as to the 2021 Winnebago Adventurer Motor Home ("Motor Home"), except as provided below.

2. Adequate Protection Payments. Beginning no later than June 30, 2023, and continuing each month thereafter, Debtor shall remit directly to Movant or cause to be remitted to Movant the regular post-petition monthly payment in the amount of \$2,196.25 pursuant to the Note and Security Agreement referred to in the Motion. All payments shall be made directly to Movant at the following address:

Security Bank of Texas  
P.O. Box 90  
Crawford, Texas 76638

3. Insurance. Debtor shall maintain full coverage insurance on the Motor Home in amounts not less than the current minimum insurance requirements under the Texas Safety Responsibility Act showing Movant as loss payee and provide such proof of insurance to Movant. Such insurance coverage shall be for a term of not less than 180 days. Debtor shall also maintain the following insurance coverage on the Motor Home with deductibles of not less than \$1,000.00:

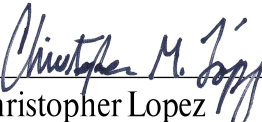
- a) Collision; and
- b) Comprehensive.

4. Plan Payments. Debtor shall timely make all Plan payments and/or direct payments to Movant according to the provisions of Debtor's Chapter 11 Plan once confirmed.


5. Default. Should Debtor default on any terms of this Order, Movant shall mail notice of the default to Debtor and its attorney by U.S. First Class Mail, postage prepaid. Should Debtor not cure the default plus pay Movant's \$50.00 default letter charge, within ten (10) days of the date Movant mails the notice, the Automatic Stay of 11 U.S.C. §362 shall be and is hereby ordered lifted with respect to Movant's collateral. Debtor's right to default and cure within the prescribed ten (10) day period is limited to two (2) such events, and nothing contained herein shall entitle Debtor to cure a third or subsequent default as to the terms of this Agreed Order. In the event of termination of the automatic stay for any reason whatsoever, the requirements of Rule 4001(a)(3) shall be waived and Movant, or its successor in interest, shall be authorized to enforce its lien rights and pursue its statutory and contractual remedies to gain possession of the Motor Home.

6. Movant shall notify the Court, Debtor, Debtor's attorney, and the creditors in this case (a) if the automatic stay is terminated; and (b) in the event that it forecloses/repossesses its interest upon the Motor Home.

Signed: June 06, 2023

  
\_\_\_\_\_  
Christopher Lopez  
United States Bankruptcy Judge

AGREED TO AND APPROVED BY:

  
\_\_\_\_\_  
JOHN MALONE  
SBOT No. 12874200  
John Malone, PLLC  
5400 Bosque Blvd., Ste. 308  
Waco, Texas 76710  
Email: [john@johnmalonepc.com](mailto:john@johnmalonepc.com)  
ATTORNEY FOR MOVANT

  
\_\_\_\_\_  
RAYMOND WILLIAM BATTAGLIA  
SBOT No. 01918055  
66 Granburg Circle  
San Antonio, Texas 78218  
Email: [rbattagliaw@outlook.com](mailto:rbattagliaw@outlook.com)  
ATTORNEY FOR DEBTOR

United States Bankruptcy Court  
Southern District of Texas

In re:  
Free Speech Systems LLC  
Official Committee of Unsecured Creditor  
Debtors

Case No. 22-60043-cml  
Chapter 11

## CERTIFICATE OF NOTICE

District/off: 0541-4  
Date Rcvd: Jun 06, 2023

User: ADIuser  
Form ID: pdf002

Page 1 of 2  
Total Noticed: 19

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.
^	Addresses marked '^' were sent via mandatory electronic bankruptcy noticing pursuant to Fed. R. Bank. P. 9036.
#	Addresses marked '#' were identified by the USPS National Change of Address system as requiring an update. While the notice was still deliverable, the notice recipient was advised to update its address with the court immediately.

**Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jun 08, 2023:**

Recip ID	Recipient Name and Address
db	+ Free Speech Systems LLC, 3019 Alvin Devane Blvd. STE 300, Austin, TX 78741-7417
aty	Kyung Shik Lee, Shannon & Lee LLP, Pennzoil Place-Suite 1300, HOUSTON, TX 77027, UNITED STATES
aty	+ Richard A. Cochrane, Caldwell Cassidy Curry PC, 2121 N. Pearl St., Ste. 1200, Dallas, TX 75201-2494
aty	+ Shannon & Lee LLP, 700 Milam Street, STE 1300, Houston, TX 77002-2736
intp	+ Alex E Jones, c/o Jordan & Ortiz PC, 500 N Shoreline Blvd, Ste 900, Corpus Christi, TX 78401-0658
cr	+ David Wheeler, et al., c/o Cain & Skarnulis PLLC, 303 Colorado Street, Suite 2850, Austin, TX 78701-0137
cr	#+ Leonard Pozner, c/o McDowell Hetherington LLP, Attention: Avi Moshenberg, 1001 Fannin Street, Suite 2700 Houston, TX 77002-6774
cr	#+ Marcel Fontaine, c/o McDowell Hetherington LLP, Attention: Avi Moshenberg, 1001 Fannin, Suite 2700 Houston, TX 77002-6774
cr	#+ Neil Heslin, c/o McDowell Hetherington LLP, Attention: Avi Moshenberg, 1001 Fannin Street, Suite 2700 Houston, TX 77002-6774
crcm	+ Official Committee of Unsecured Creditors of Alexa, c/o Marty L. Brimmage, Jr., Akin Gump Strauss Hauer & Feld LLP, 2300 N. Field Street, Suite 1800, Dallas, TX 75201-4675
cr	+ Reeves Law, PLLC, 702 Rio Grande St., Ste. 203, Austin, TX 78701-2720
cr	+ Richard M. Coan, c/o Cain & Skarnulis PLLC, 303 Colorado Street, Suite 2850, Austin, TX 78701-0137
cr	#+ Scarlett Lewis, c/o McDowell Hetherington LLP, Attention: Avi Moshenberg, 1001 Fannin Street, Suite 2700 Houston, TX 77002-6774
cr	+ Security Bank of Crawford, P.O. BOX 90, Crawford, Tx 76638-0090
cr	#+ Veronique De La Rosa, c/o McDowell Hetherington LLP, Attention: Avi Moshenberg, 1001 Fannin Street, Suite 2700 Houston, TX 77002-6774

TOTAL: 15

**Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.**

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
cr	+ Email/PDF: acg.acg.ebn@aisinfo.com	Jun 06 2023 20:20:03	Ally Bank, c/o AIS Portfolio Services, LLC, 4515 N Santa Fe Ave. Dept. APS, Oklahoma City, OK 73118-7901
cr	+ Email/Text: lemaster@slollp.com	Jun 06 2023 20:14:00	PQPR Holdings Limited, LLC, c/o Streusand Landon Ozburn & Lemmon LLP, attn: Stephen Lemmon, 1801 S. Mopac Expressway, Suite 320, Austin, TX 78746-9817
cr	^ MEBN	Jun 06 2023 20:10:57	Texas Comptroller of Public Accounts, Revenue Acco, Christopher J. Dylla, P.O. Box 12548, Austin, TX 78711-2548
cr	+ Email/Text: BKECF@traviscountytx.gov	Jun 06 2023 20:14:00	Travis County, c/o Jason A. Starks, P.O. Box 1748, Austin, TX 78767-1748

TOTAL: 4

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

District/off: 0541-4

User: ADIuser

Page 2 of 2

Date Rcvd: Jun 06, 2023

Form ID: pdf002

Total Noticed: 19

Recip ID	Bypass Reason	Name and Address
aty		Akin Gump Strauss Hauer & Feld LLP
cr		ADP TotalSource, Inc.
wit		Charles "Charlie" Cicack
intp		David Ross Jones
op		Marc Schwartz
op		Marc Schwartz
op		Schwartz Associates, LLC
op		Schwartz and Associates, LLC
intp		Shelby A Jordan
intp		Sweetwater Holdings Group, Inc.
op		W. Marc Schwartz

TOTAL: 11 Undeliverable, 0 Duplicate, 0 Out of date forwarding address

## NOTICE CERTIFICATION

**I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Jun 08, 2023

Signature: /s/Gustava Winters